

May 18, 2020

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

ATTN: Andrew Dodge, Director, Office of Electric Reliability

Re: Response to Data Request
North American Electric Reliability Corporation, Western Electricity Coordinating Council
Docket No. RM19-20-000

Dear Mr. Dodge:

The North American Electric Reliability Corporation (“NERC”) and Western Electricity Coordinating Council (“WECC”) hereby respond to the data request issued in the above-referenced docket on February 18, 2020.¹

On September 6, 2019, NERC and WECC filed a joint petition with the Commission for approval of proposed regional Reliability Standard BAL-002-WECC-3 (Contingency Reserve), in which Requirement R2 of the currently effective standard is proposed to be retired.² In this petition, NERC and WECC stated that Requirement R2 is now redundant to the continent-wide frequency response standard and, based on the results of a one-year field test performed by WECC from May 1, 2017 to April 30, 2018, WECC determined that retirement of Requirement R2 would have no adverse impact on reliability in the Western Interconnection.

On February 18, 2020, the Commission, pursuant to authority delegated to the Director of the Office of Electric Reliability, issued a data request seeking additional information within 30 days. Specifically, the data request seeks:

¹ *Data Request in Response to Joint Petition Seeking Approval of Regional Reliability Standard BAL-002-WECC-3*, Docket No. RM19-20-000 (Feb. 18, 2020).

² *Petition of NERC and WECC for Approval of Proposed Regional Reliability Standard BAL-002-WECC-3*, Docket No. RM19-20-000 (Sep. 6, 2019).

1. The following data, from April 30, 2018 through September 30, 2019: (1) for any reportable Disturbance Control Standard (“DCS”) event, the date, time, and required amount of Contingency Reserves at the time of the event, the actual amount of Operating Reserves – Spinning at the time of the event, and the actual DCS performance; and (2) for events involving a loss of 700 megawatts (“MW”) or greater, whether it is a reportable DCS event or not, the date and time of the event, the name of the resource(s), and the total MW loss; **and** the amount of spinning reserve above or below 50 percent during non-event times on an hourly basis from May 1, 2017 through September 30, 2019.
2. Supporting data for NERC frequency response metric (M-4) as it pertains to the Western Interconnection from May 1, 2017 through September 30, 2019.

On March 6, 2020, the Commission granted NERC and WECC’s March 4, 2020 request for an extension of time, to May 4, 2020, to respond to the above-referenced data request.³ On April 2, 2020, the Commission issued a notice further extending the time for response to June 3, 2020.⁴

In response to the data request, NERC and WECC provide two Microsoft Excel (.xlsx) files. **Attachment 1** contains NERC and WECC’s response to the data requested under Item 1. **Attachment 2** contains NERC and WECC’s response to the data requested under Item 2, above.

With respect to Attachment 1, NERC and WECC note the following. This file contains information from three Reserve Sharing Groups (Northwest Power Pool (NWPP), Rocky Mountain Reserve Sharing Group (RMRG), and Southwest Reserve Sharing Group (SRSG)), and two Balancing Authorities (Los Angeles Department of Water and Power (LADWP) and California Independent System Operator (CISO)). Hourly data for RMRG stops on September 3, 2019, as the entity ceased operations on that date and merged with NWPP. Certain hourly data for NWPP is not available, as NWPP does not maintain information on the required Contingency Reserve Level and the amount of Operating Reserves-Spinning whenever there is a balancing event, regardless of whether it meets the definition of a DCS event, and reserves are called.

Any questions regarding NERC and WECC’s data submission should be directed to the undersigned, with copy to Candice Castaneda, NERC Counsel, at candice.castaneda@nerc.net, and Chris Albrecht, WECC Senior Legal Counsel, at calbrecht@wecc.org.

³ *Notice of Extension of Time*, Docket No. RM19-20-000 (Mar. 6, 2020).

⁴ *Notice of Extension of Time*, Docket No. RM19-20-000 (Apr. 2, 2020).

Respectfully submitted,

/s/ Lauren A. Perotti

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Enclosures:

Attachment 1: Data Responsive to Item 1

Attachment 2: Supporting data for NERC frequency response metric (M-4)

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 18^h day of May, 2020.

/s/ Lauren A. Perotti

Lauren A. Perotti

*Counsel for North American Electric
Reliability Corporation*